



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

FILED.

DATED: 4:39 pm, August 31, 2021

U.S. MAGISTRATE JUDGE

CHRISTOPHER CHIOU
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District of Nevada
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NICOLAS SANTOS and
WILFRED SANTOS,

Defendants.

Case No.:

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Christopher Chiou, Acting United States Attorney, and Allison Reese, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of 18 United States Code, Section 922(a)(1)(A) - Dealing Firearms Without a License, and 18 United States Code, Section 922(o) - Unlawful Possession or Transfer of a Machine Gun; that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the

1 ongoing investigation. Accordingly, there is reason to believe that the disclosure of the
2 information contained within the Complaint will jeopardize the investigation, including by
3 giving the targets an opportunity to flee or continue flight from prosecution or change patterns of
4 behavior.

5 The Government further submits that it is necessary for the Complaint to be sealed in light
6 of the fact that the targets of this investigation utilize digital devices and the social media platform
7 Snapchat to conduct their illegal activities. If the targets became aware of the investigation, they
8 could delete and destroy evidence, including but not limited to text messages, photographs, and
9 social media account information or messages received and sent over those platforms.
10 Additionally, the Affidavit references other co-conspirators and confederates that are under
11 investigation, such as suppliers of the firearms, machinegun conversion devices, and illegal
12 controlled substances. Accordingly, there is reason to believe that notification of the existence of
13 complaint will seriously jeopardize the investigation, as noted previously, and would likely place
14 law enforcement at higher risk of confrontation when securing the arrest of the targets.

15 DATED: August 31, 2021.

16 Respectfully submitted,

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

19 *Allison Reese*
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ALLISON REESE
21 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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U.S. MAGISTRATE JUDGE

UNITED STATES OF AMERICA,

Case No.:

Plaintiff,

ORDER TO SEAL

vs.

NICOLAS SANTOS and
WILFRED SANTOS,

Defendants.

Based on the pending Application of the Government, and good cause appearing therefor,
IT IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 31 day of August, 2021.




HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE